UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

CAROL M. HIGHSMITH, and THIS IS AMERICA!, INC., Plaintiffs, v. GETTY IMAGES (US), INC., LICENSE COMPLIANCE SERVICES, INC., PICSCOUT, INC., ALAMY, INC., ALAMY, LTD., and JOHN DOES 1 - 100 Defendants.	Civil Action No. 16-cv-5924 (JSR) **NOTICE OF MOTION**

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law, and upon all prior proceedings, pleadings, and filings in this action, defendant License Compliance Services, Inc. ("Defendant") will move this Court at the United States District Court, Southern District of New York, 500 Pearl Street, Courtroom 14B, New York, NY, before the Honorable Jed S. Rakoff, United States District Judge, for an order pursuant to Fed. R. Civ. P. 12 (b)(6), dismissing with prejudice Counts III, V, IX, and XII of Plaintiffs' First Amended Complaint – the only counts against defendant License Compliance Service, Inc.; and further relief the Court may deem just and proper.

PLEASE TAKE FURTHER NOTICE that, in accordance with the schedule set by the Court, Plaintiffs' answering papers shall be filed and served on September 23, 2016, reply papers, if any, shall be served on or before October 3, 2016. The Court has scheduled oral argument for October 14, 2016 at 4:30pm.

Dated: New York, New York
September 6, 2016

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